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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SOCORRO CHAVEZ, individually; and JUAN  
CHAVEZ, individually,

Plaintiffs,

vs.

WYNDHAM VACATION RESORTS, INC.;  
AND TOM S. PALMER, AN INDIVIDUAL,  
AND JOHN DOES 1-50,

Defendants.

Case No.: 2:20-1222-JCM-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANT TOM S. PALMER TO  
RESPOND TO FIRST AMENDED  
COMPLAINT**

Defendant, Wyndham Vacation Resorts, Inc. (“WVR”) and Tom S. Palmer, by and through their counsel, Armstrong Teasdale LLP, and Plaintiffs Socorro Chavez and Juan Chavez (collectively, “Plaintiffs”), by and through their counsel, Albright, Stoddard, Warnick & Albright, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline for Defendant Tom S. Palmer to respond to the First Amended Complaint (ECF No. 10), which was filed on July 17, 2020, and served on Mr. Palmer on August 5, 2020, by two (2) weeks so that Mr. Palmer’s response would be due on September 9, 2020, instead of the current deadline of August 26, 2020. This is the first request to extend this particular deadline.

Good cause exists to extend the deadline for Mr. Palmer to respond to the First Amended Complaint by two (2) weeks, or to September 9, 2020. Mr. Palmer requires some additional time to respond to the First Amended Complaint and Plaintiffs do not oppose. This request is made in good

1 faith and is not intended to unreasonably delay this matter. In particular, this case was only recently  
2 filed and the parties have no yet held their case conference under Fed. R. Civ. P. 26(f).

3 Based on the foregoing, the parties respectfully request that this Court extend Mr. Palmer's  
4 deadline to respond to the First Amended Complaint by two (2) weeks, or to September 9, 2020.

5  
6 Dated this 24<sup>th</sup> day of August, 2020.

Dated this 24<sup>th</sup> day of August, 2020.

7 **ARMSTRONG TEASDALE LLP**

**ALBRIGHT, STODDARD, WARNICK  
& ALBRIGHT**

8  
9 By: /s/ Michelle D. Alarie  
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12 *Attorneys for Defendant Wyndham Vacation  
13 Resorts, Inc. and Tom S. Palmer*

*Attorneys for Plaintiffs Socorro Chavez  
and Juan Chavez*

14  
15 **ORDER**

16 **IT IS SO ORDERED.**

17   
18 **UNITED STATES MAGISTRATE JUDGE**

19 **DATE: August 25, 2020**  
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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5 (b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing was served:

☒ via electronic service to the address(es) shown below:

gma@albrightstoddard.com  
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☐ via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class postage prepaid, on the date and to the address(es) shown below:

G. Mark Albright, Esq.  
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*Attorneys for Plaintiffs*

Date: August 24, 2020

/s/ Jessica Myrold

An employee of Armstrong Teasdale LLP